In the outstanding Office Action, paragraph 3, claims 1-4, 6-12, and 14-16 are rejected under 35 U.S.C. 103(a) as being unpatentable over Killcommons et al. (US PAT. 6,424,996 B1 hereinafter Killcommons).

In the outstanding Office Action, paragraph 4, claims 5 and 13 are rejected under 35 U.S.C. 103(a) as being unpatentable over Killcommons as applied to claims 4 above, and further in view of Computer Dictionary, Third edition, Microsoft Press, 1997, ISBN 1-57231-446-X, p. 462.

Section 2142 of the MPEP states that in order for a prima facie case of obviousness to be established, three basic criteria must be met, one of which is that the reference or combinations of references must teach or suggest all the claim limitations.

The Applicants respectfully submit that the pending claims define allowable subject matter and, therefore, the rejections should be removed.

With regard to the rejection of claim 1 being unpatentable over Killcommons set forth in paragraph 3 of the Office Action, Applicants respectfully traverse. Applicants submit that Killcommons does not teach or suggest the claimed invention. In particular, Killcommons does not teach or suggest accessing imaging data stored at multiple sites by searching for associated identification data on one server located at one site, as does the claimed invention.

The claimed invention stores all image-related identification data at one site on one server and, therefore, allows imaging data that is stored at multiple sites on a network to be accessed from those multiple sites by searching for the associated identification data at only one site. Referring to Fig. 1 of the application, all identification data is stored at a first location 1 on information management server (IMS) 40. However, imaging data may be stored at multiple sites (e.g., sites 1 and 1A, see Fig. 1) on the network 10 on different image storage units (ISUs) (e.g., 50 and 50A).

When imaging data is to be stored, at whatever sight on the network 10, the associated identification data is captured by and integrated into the one site on IMS server 40.

The identification data stored on IMS 40 is used to access imaging data stored at the multiple sites (e.g., sites 1 and 1A, see Fig. 1) on the network 10. As a result, in the claimed invention, only one server 40 at one location 1 is queried in order to locate imaging data stored at any location on the network 10. The imaging data may be accessed and displayed at any site on the network 10.

Killcommons, however, shows just one image storage site, server 20, storing all imaging data at the one site (see Fig. 1) along with the associated identification data. The imaging data stored on server 20 may be accessed by multiple user units (e.g., 50 and 80). However, the user units do not store imaging data themselves, as does server 20. Unlike the claimed invention, all imaging data is stored at one site on server 20. Server 20 also stores the identification data associated with the stored imaging data.

If multiple storage sites having servers 20, of Killcommons, were to be networked together to provide multiple storage sites on a network, a user unit on the network would need to have knowledge of all these storage sites on the network (i.e., all the servers 20) and perform a query of each storage site in order to locate a desired image.

In the claimed invention, only one server 40 at one location 1 is queried for identification data in order to locate imaging data stored at any location on the network. As a result, the claimed invention allows imaging data to be stored at multiple locations on a network, without having to query those multiple locations to find a particular set of imaging data as does Killcommons.

Based on at least the foregoing, Applicants believe and respectfully submit that the rejection of claim 1 as being unpatentable over Killcommons has been overcome and should be removed.

3

With regard to the rejection of claim 9 being unpatentable over Killcommons set forth in paragraph 3 of the Office Action, Applicants respectfully submit that at least the same foregoing reasons set forth for claim 1 overcome the rejection and, therefore, the rejection should be removed.

With regard to the rejection of claims 2-4, 6-8, 10-12, and 14-16 being unpatentable over Killcommons set forth in paragraph 3 of the Office Action, Applicants respectfully submit that at least the same foregoing reasons set forth for claims 1 and 9 above overcome the rejection and, therefore, the rejection should be removed because claims 2-4 and 6-8 are dependent on claim 1, and claims 10-12 and 14-16 are dependent on claim 9.

With regard to the rejection of claims 5 and 13 being unpatentable over Killcommons as applied to claim 4 and further in view of Computer Dictionary, Third edition, Microsoft Press, 1997, ISBN 1-57231-446-X, p. 462 set forth in paragraph 4 of the Office Action, Applicants respectfully submit that at least the same foregoing reasons set forth for claims 1 and 9 above overcome the rejection and, therefore, the rejection should be removed because claims 5 and 13 are dependent on claims 1 and 9, respectively.
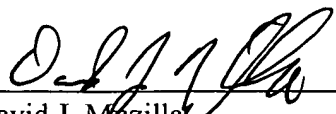
In view of the foregoing, it is respectfully submitted that the pending claims 1-16 define allowable subject matter. A favorable action on the merits is respectfully requested.

Should anything remain in order to place the present application in condition for allowance, the Examiner is kindly invited to contact the undersigned at the telephone listed below.

Please charge any additional fees or credit overpayment to the Deposit Account of McAndrews, Held & Malloy, Ltd., Account No. 13-0017.

Respectfully submitted,

Date: _December 5, 2002_ By: _(signature)_

David J. Mazilla

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